

Mohammed Ahmed

From: Peter Batten
Sent: 22 April 2024 11:59
To: Planning
Cc: Michelle Atkins
Subject: 2024/0377/P - Objection
Attachments: 2024-04-22 141 Albert Street, Camden 7879 RGP Objection Letter.pdf

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Good morning,

Further to the recent email from Michelle Atkins of Young & Co.'s Brewery PLC (operator of the Spread Eagle pub) please find attached an objection on their behalf to planning application (ref. 2024/0377/P).

I trust this will be given due consideration but please let me know if you have any queries or need anything further from us. Please could you confirm this has been received?

Kind regards,
Peter

Peter Batten
Associate

Transport Planning and Infrastructure Design Consultants



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22 April 2024
Our Ref: 7879/L01
Planning App Ref: 2024/0377/P

To whom it may concern,

RE: OBJECTION TO PLANNING APPLICATION 2024/0377/P, OUTSIDE NO. 141 ALBERT STREET

I write in relation to the planning application on the carriageway adjacent to 141 Albert Street currently awaiting determination by Camden Council.

RGP are commissioned by Young & Co.'s Brewery PLC, operator of Spread Eagle public house at no. 141 Albert Street, and object to the planning application due to the impact this would have on servicing arrangements for their public house.

In preparing this representation, RGP has reviewed the planning application submission documents available online. The proposal would create a new cycle hire docking station on the western side of Albert Street, just south of its junction with Parkway. It is understood this would provide a replacement facility for an existing docking station being relocated from Parkway due to bus lane changes.

The location of the proposed cycle hire docking station would occupy the kerbside space that is currently used by delivery and servicing vehicles when servicing the pub. The docking station would be directly in front of the pub's cellar hatch, which is used to deliver drinks to the public house, therefore creating particular conflict and issues for delivery and servicing purposes.

The planning application submission material does not reference the cellar hatch location or the pub's established servicing arrangements generally. This letter is therefore submitted in order to detail the pub's essential servicing requirements such that proposals for a new cycle hire docking station do not compromise the pub's operation. Alternative options appear to be available for which to site the relocated cycle hire docking station, examples of which are also referred to herein.

The existing public house is an important community asset and is a Grade II listed building. It is therefore particularly important that its ability to operate is given full consideration.

Spread Eagle Delivery Requirements

To provide context to the site's servicing requirements, the pub's typical weekly delivery requirements are set out below within **Figure 1**.

Servicing Purpose	Timing	Activity
Beer kegs and bottle delivery	Weekday mornings	Delivery of heavy kegs and bottles.
Wine and spirits	Weekday mornings	Pallets loaded with wine and spirits.
Keg collection	Weekday mornings	Empty kegs removed from site.
Various food deliveries	Weekday mornings	Delivered via pallets or boxes.
Beer Gas delivery	1 delivery every few weeks	Tanker must park within a few meters of front door to fill bulk supply canisters.
Cardboard collection	Weekday mornings	Cardboard bins emptied
Glass bin collection	Weekday mornings	Glass bins emptied
General waste collection	Weekday mornings	General waste collected

Figure 1. Weekly Delivery Requirements

As summarised above, the pub requires a large number of weekly delivery / service vehicle visits which are typically accommodated on weekdays during the morning. This includes multiple weekly deliveries of heavy drinks kegs which are required to be dropped directly into the cellar hatch.

The vast majority of deliveries are made using rigid HGVs approximately 10m to 12m in length. Currently, these are accommodated immediately outside the site on the nearside of Albert Street, which comprises single yellow line “no parking” restrictions during certain hours but permits loading / unloading activity at all times. As a result, all deliveries and refuse collections take place directly outside the site, minimising transfer distances and enabling kegs to be lowered directly into the cellar hatch which abuts the Albert Street footway. This is important given the volume, frequency and type of deliveries required for the site's operation.

This location also enables delivery vehicles to pull away from the flow of traffic hence ensuring safety of operatives, segregation from vehicles & pedestrians and enabling continued and unobstructed traffic flows.

Implications of the Planning Application

The proposals would create the following key issues and concerns with regards to servicing of the public house (further detail of which is provided in the subsequent section of this letter):

- i. The proposed docking station would impede access to the cellar hatch.
- ii. Alternative locations would need to be identified for delivery vehicle access, which would become more remote and unworkable for the required delivery vehicle types and frequencies.
- iii. This would increase goods transfer distances (and hence delivery durations) as well as increasing conflict, potentially requiring goods to be transferred across roads and busier footways.

- iv. The proposals may create safety risks to staff and the public, as well as operational challenges.

Drinks Deliveries and Cellar Hatch Access Requirements

The proposed docking station would impede access to the cellar hatch and create a far more complex and distant route by which to gain access. These increased transfer distances would be particularly problematic for large keg deliveries, for example, since manually transferring these can be a significant undertaking due to their heavy weight. Not only would this increase delivery durations, but this would also represent a substantial physical challenge for delivery operatives.

TfL's Kerbside Loading Guidance document provides guidance and best practice for accommodating delivery and servicing across London. Pages 14 and 15 highlight the specific challenges associated with delivering kegs and casks to London's pubs, both when delivering and collecting, given that large kegs weigh 128kg. It highlights that drinks delivery vehicles will often need to be stopped and aligned with the cellar hatch due to strengthened pavement in those locations and so that vehicles oversee the trapdoor.

Therefore, it is clearly most appropriate to locate deliveries alongside the cellar hatch. As a result, Youngs would strongly encourage the applicant to consider alternative locations for the proposed docking station, since a number of alternative locations appear to be available (detailed herein).

Alternative Delivery Vehicle Locations

Deliveries currently take place from the single yellow line on the nearside of Albert Street, away from the flow of traffic and directly in front of the cellar hatch. Should this location become unavailable, alternative delivery vehicle locations would be required, however, as detailed below, there is not an appropriate alternative:

- i. Eastern side of Albert Street where there is an existing single yellow line. However, utilising this space would require deliveries to be transferred across Albert Street and hence across the flow of traffic, within a few metres of vehicle turning movements off the A4201 junction. This is not considered a suitable or safe alternative arrangement. This may also likely lead to conflicting deliveries with the pub on the eastern side of Albert Street as they are likely to require deliveries at concurrent times i.e. in the morning prior to pub opening.
- ii. A4201 Parkway, north of the site where there is an existing single yellow line between parking bays and the Albert Street junction. However, the single yellow line in this location measures less than 10m and therefore does not provide sufficient space for the required delivery vehicle types. As a result, this location is not able to accommodate deliveries.
- iii. Within designated parking bays e.g. those on Parkway or Albert Street. However, there is no guarantee of sufficient clear space being available close to the site for delivery purposes and therefore use of such parking bays cannot be relied upon. It is considered important for a dedicated delivery and servicing location to be available to ensure deliveries are not compromised.
- iv. Locations further north-east of Albert Street on Parkway are considered too distant from the site and would require goods to be transferred across Albert Street (at the junction with Parkway) and would be unsuitable for the various reasons outlined above. In addition, there

are a currently very few loading restrictions on Parkway but, as part of the proposed bus route improvement scheme, loading would be generally prohibited other than in a handful of designated bays, hence increasing competition for delivery space on Parkway.

As a result, use of the kerbside space on the western side of Albert Street is considered essential for the continued operation of the Spread Eagle public house and hence the creation of a cycle hire docking station at this location would compromise the operation of the long-established public house.

Review of Alternative Locations for the Docking Station

RGP consider there could be a number of alternative options for providing the replacement cycle hire docking station on Albert Street. For example, there are sections of single yellow lines and kerb buildouts approximately 30m to 40m south of the current proposed location, which would appear to provide limited highway benefit at present. These could therefore accommodate the relocated docking station with limited impact.

It is also noted the existing carriageway width on this section of Albert Street is very generous considering it facilitates single-file one-way traffic. The effective width between on-street parking bays on the eastern and western sides of the road measures approximately 7.5m, meaning this effective road width has scope to be reduced, without impacting on traffic flows or manoeuvring. This could enable the parallel parking bays on the eastern side of Albert Street to be re-orientated as perpendicular parking bays (as is the case further south on Albert Street). This re-aligning and re-lining of parking bays would create additional kerbside space without requiring significant footway or kerb alterations. An indicative layout is shown within the image below.



Alternatively, it may be possible that some of the existing on-street parking bays on Albert Street can be removed entirely to provide additional kerbside space for the cycle hire docking station. Given this is a PTAL 6b location (representing the highest level of public transport connectivity achievable) current planning policies would support a reduced level of car parking due to the extensive opportunities to travel by more sustainable modes.

Summary

I trust that the above matters will be given due consideration prior to the determination of the planning application however I would be pleased to discuss the proposals in further detail should this be of assistance.

Yours sincerely,